

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)
)
)
Patricia M. Todd) Case No. 18-44539-399
)
Debtor.) Chapter 13

DEBTOR'S MOTION TO AMEND CONFIRMED CHAPTER 13 PLAN

Comes now Kimber H. Baro, Attorney for Debtor, and for her motion states:

1. Debtor filed for relief on July 18, 2018.
2. The chapter 13 plan was confirmed on October 10, 2018. The confirmed plan provides for monthly payments of \$1,320.00 for 60 months, with a 100% guarantee to unsecured creditors.
3. The confirmed plan is not feasible.. The sole purpose of the First Amended Plan is to increase the plan payment from \$1,320.00 to \$1,725.00 starting in month 3 of the plan.
4. There has been no change in the debtor's income.

WHEREFORE, Counsel respectfully prays for an Order of this Court granting Debtor's Motion to Amend Confirmed Chapter 13 Plan, for an Order confirming Debtor's First Amended Chapter 13 Plan, and for such other and further orders as the court deems just and proper.

Kimber H. Baro 33690MO
s/ Kimber H. Baro
Attorney for Debtor
1605 N. Lindbergh Blvd
Florissant, MO 63031
Tel: (314) 896-1999

Fax: (314) 942-7195
kbaro@barolawfirm.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on October 11, 2018 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, postage fully pre-paid, addressed to those parties listed below on October 11, 2018.

All creditors identified on attached Matrix

/s/ Kimber H. Baro

Advance Financial
100 Oceanside Drive
Nashville, TN 37204

Americredit Financial Services
dba GM Financial
P.O. Box 183853
Arlington, TX 76096-3853

Amplify Lending
597 Pearce Pipe Road
2nd Floor
Lac Du Flambeau, WI 54538

Capital One Auto Finance
c/o Ascension Capital Group
P.O. Box 201347
Arlington, TX 76006

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Leap Credit
3348 Peachtree Street NE
Suite 150
Atlanta, GA 30326

Missouri Department of Revenue
Attn: Bankruptcy Dept
P.O. Box 475
Jefferson City, MO 65105

MSD
Attn: Bankruptcy
2350 Market Street
Saint Louis, MO 63103

Navient Solutions Inc on behalf of USAF
P.O. Box 9430
Attn: Bankruptcy Litigation Unit E3149
Wilkes Barre, PA 18773-9430

Porania, LLC
P.O. Box 11405
Memphis, TN 38111

Quantum3 Group LLC
as agent for MOMA Funding LLC
P.O. Box 788
Kirkland, WA 98083-0788

Seterus Inc.
14523 SW Millikan Way
Suite 200
Beaverton, OR 97005

Seterus PPN

Seterus, Inc.
Attn: Bankruptcy Department
P.O. Box 1047
Hartford, CT 06143-1047

SouthLaw, P.C.
13160 Foster
Suite 100
Overland Park, KS 66213-2660

St. Louis County Collector of Revenue
41 South Central Avenue
Saint Louis, MO 63105

United States Attorney
111 South 10th Street
20th Floor
Saint Louis, MO 63102